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July 7, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 10-90, Public Notice DA 17-561, Released June 8, 2017

Dear Ms. Dortch:

The Wireline Competition Bureau released DA 17-561 on June 8, 2017 which included an updated list of census blocks eligible for Connect America Phase II Support. The Bureau requested feedback on three categories of census blocks. Blackfoot Telephone Cooperative, Inc. respectfully provides the attached comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Aaron M. Neilson", is written over a faint, larger blue signature that appears to read "Aaron M. Neilson".

Aaron M. Neilson
Vice President – General Counsel

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	
)	WC Docket No. 10-90
Census Blocks Eligible for Connect America)	
Phase II Support Public Notice DA 17-561)	

**COMMENTS OF
BLACKFOOT TELEPHONE COOPERATIVE, INC.**

I. INTRODUCTION & SUMMARY

Blackfoot Telephone Cooperative, Inc. (“Blackfoot”) is a rate-of-return carrier located in Montana. Blackfoot submits these comments in response to the Wireline Competition Bureau’s Public Notice DA 17-561, released on June 8, 2017, in which the Bureau requested feedback on three categories of census blocks. Blackfoot comments are responsive to two of those categories.

**II. CENSUS BLOCKS WITHIN A RATE-OF-RETURN CARRIER STUDY AREA
BOUNDARY**

Blackfoot conducted an audit of census blocks identified by the Bureau as potentially available for inclusion in the Phase II auction unless identified as within a rate-of-return carrier study area boundary. Blackfoot identified six census blocks falling within its study area boundaries and one that is intersected by its boundary (Census Block: 300770001002396.) Attachment A includes a listing of the seven census blocks mentioned above.

III. CENSUS BLOCKS WHERE BLACKFOOT MAY NOT BE ABLE TO EXTEND BROADBAND UNDER REASONABLE REQUEST STANDARD

Blackfoot has two exchanges that are “islands” within its study area. Providing voice and broadband service to Alta, MT and Powell, ID requires Blackfoot to rely on a Price Cap network for transport. To date, Blackfoot has been unable to deliver broadband services to those two exchanges because the Price Cap Carrier indicates that there are no available facilities to increase the amount of transport Blackfoot purchases. Blackfoot hopes that with CAF Phase II support the Price Cap Carrier will upgrade their facilities resulting in Blackfoot’s ability to purchase the needed transport and deliver broadband services to customers in those areas.

ATTACHMENT A

Census Block	State	Carrier	Study Area Code
300399617002835	MT	Blackfoot	483308
300630016003022	MT	Blackfoot	482235
300630016004003	MT	Blackfoot	482235/483308
300770001002230	MT	Blackfoot	482235
300770001002235	MT	Blackfoot	482235
300770001002351	MT	Blackfoot	482235
300770001002396	MT	Blackfoot	482235